REMARKS

Claims 1-20 are currently pending in the above application and stand rejected. Reconsideration of the above-identified application in view of the following remarks is respectfully requested.

I. Rejection of Claims 1-4, 6-9 and 11-20 under 35 U.S.C. §102(e)

The Examiner has rejected claims 1-9 and 11-20 under 35 U.S.C. §102(e) as anticipated by U.S. Published Patent Application No. 2004/0240542 to Yeredor et al. (hereinafter: Yeredor). Anticipation requires a single prior art reference that discloses each element of the claim. W.L. Gore & Associates v. Garlock, Inc., 220 U.S.P.Q. 303, 313 (Fed. Cir. 1983), cert. denied 469 U.S. 851 (1984). "The identical invention must be shown in as complete detail as is contained in the ... claim". Richardson v. Suzuki Motor Co., 868 F.2d 1226, 1236, 9 U.S.P.Q.2d 1913, 1920 (Fed. Cir. 1989). It is respectfully submitted that Yeredor fails to teach all of the limitations of claims 1-9 and 11-20.

Claim 1 recites a method of analyzing video surveillance data from a plurality of video inputs recording entrants to a

secured location. A plurality of entrant profiles are constructed via data mining algorithms, detailing typical attributes of the entrants. Video inputs are analyzed with a plurality of independent automated decision-making systems. Each independent automated decision making system determines if an abnormal condition exists based upon the constructed profiles. The determinations of the plurality of decision-making systems are processed to determine if an alarm condition exists. Claim 11 recites a computer program product encompassing similar subject matter.

It is respectfully submitted that Yeredor does not teach constructing a plurality of entrant profiles via data mining algorithms that detail typical attributes of the entrants. Yeredor looks for generic suspicious behavior, such as a first person setting down a suitcase for retrieval by a second person. There is no indication that Yeredor constructs profiles for individual entrants, as recited in the claims. The Office Action cites paragraph 0036 of Yeredor as providing the required teaching, but there is no teaching in the cited portion of generating a plurality of entrant profiles, where

each entrant profile details typical attributes of the entrants.

It is also submitted that Yeredor fails to teach the use of a plurality of independent automated decision-making systems, where independent automated decision-making system determines if an abnormal condition exists based upon the constructed profiles. At best, Yeredor teaches a single, rule based processor that identifies alarm conditions. In the example given in paragraphs 0035-0036, a rule-based classification system appears to be used, with various combinations of object merging and unmerging triggering an alarm condition. There is no teaching, however, of multiple, independent decision-making systems that each make a determination of an abnormal condition. The Office Action cites paragraph 0035, which, as described above, fails to provide the required teaching.

It is further submitted that Yeredor does not teach processing the determinations of the plurality of decision-making systems to determine if an alarm condition exists. The recited claim element is essentially an arbitration step

capable of reconciling the output of the plurality of independent decision-making systems, which is required since the systems are recited as independent and could give conflicting outputs. Yeredor does not teach processing the determinations of a plurality of independent decision-making systems to determine if an alarm should be triggered as recited in claims 1 and 11. There is simply no enabling teaching of arbitrating among a plurality of independent outputs. The Office Action cites paragraphs 0035 and 0040 as providing this teaching, but there is no teaching of resolving potentially conflicting determinations from multiple systems in these passages.

In light of the above, it is respectfully submitted that claims 1 and 11 define patentable invention over Yeredor. Withdrawal of the rejection of claims 1 and 11 under 35 U.S.C. §102(e) is thus respectfully requested.

Turning to the dependent claims, each of claims 2-4, 6-9, and 12-20 depend directly or indirectly from one of claims 1 and 11 and is allowable for at least the reasons discussed with respect to those claims. Several exemplary dependent

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claims are discussed in detail below, but it will be appreciated that no concession of the patentability of a given claim should be inferred from the omission of a given claim herein.

Claim 8, which depends from claim 7, recites combining a plurality of outputs of decision-making systems as a weighted linear combination of the outputs. The Office Action recites paragraph 0032 as providing this teaching, but there is no teaching therein of combining a plurality of system outputs as a weighted linear combination. It is thus respectfully submitted that claim 8 defines patentable invention over Yeredor.

Claim 16, which depends from claim 11, recites that the arbitrator that processes the determinations of the plurality of decision-making systems comprises a fuzzy logic system. The Office Action cites paragraphs 0031 and 0040 as providing this teaching, but there is no teaching in these paragraphs of a fuzzy logic system or of an arbitrator that processes the determinations of a plurality of independent decision making

systems. It is respectfully submitted that claim 16 defines patentable invention over Yeredor.

Claim 19, which depends from claim 11, recites that data mining portion includes an artificially intelligent trained program that retrieves information from external data sources. The Office Action cites paragraphs 0017 and 0036 as providing this teaching, but there is no teaching of data mining algorithm that extracts information from external sources in these paragraphs or anywhere else in Yeredor. It is respectfully submitted that claim 19 defines patentable invention over Yeredor.

Claim 20, which depends from claim 11, recites that the external data sources include at least one preselected Internet web page. The Office Action cites paragraph 0030 as providing this teaching, but there is no teaching of mining data for entrant profiles from Internet web pages in these paragraphs or anywhere else in Yeredor. It is thus respectfully submitted that claim 19 defines patentable invention over Yeredor.

II. Rejection of Claims 5 and 10 under 35 U.S.C. §103

Claims 5 and 10 have been rejected under 35 U.S.C. §103 as unpatentable over Yeredor in light of U.S. Published Patent Application No. 2004/0177053 to Donoho et al. (hereinafter: Donoho). Claims 5 and 10 each depend from claim 1, and are allowable for at least the reasons described above. Donoho is relied upon solely for a teaching of neural networks, and does not remedy the deficiencies of Yeredor with respect to claim 1 as described herein. It is thus respectfully requested that the rejection of claims 5 and 10 under 35 U.S.C. §103 be withdrawn.
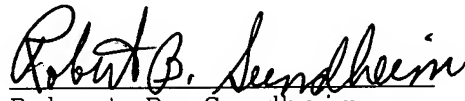
III. Conclusion

In light of the above, it is respectfully submitted that claims 1-20 are allowable over the cited art. Withdrawal of the rejection of these claims and passage of the application to allowance is respectfully submitted.

Please charge any deficiency or credit any overpayment in the fees for this amendment to our Deposit Account No. 20-0090.

Respectfully submitted,

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